

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiff,

v.

HOMMY SANTIAGO RODRIGUEZ
Defendant.

Criminal no. 19-604 (PAD)

Urgent Motion regarding potential transfer of Mr. Santiago Rodríguez from the jurisdiction
To the Honorable Court:

Comes now the defendant, Mr. Santiago Rodríguez and respectfully states and prays as follows:

1. The parties in this matter have agreed in principle to a plea agreement.
2. Accordingly, Mr. Santiago Rodríguez has received a copy of the plea agreement and is currently reviewing it to ensure that it contains the verbal plea agreement between the parties.
3. The parties are hopeful that this process is completed in the next 5 –10 days.
4. Nevertheless, Mr. Santiago Rodríguez contacted the undersigned today, May 2, 2022, to inform of his immediate transfer from MDC-Guaynabo.
5. Since the parties are close to completing this important and delicate process, immediate access to Mr. Santiago Rodríguez by the undersigned is crucial. Therefore, it is imperative that Mr. Santiago Rodríguez not be removed the jurisdiction.

WHEREFORE, Mr. Santiago Rodríguez respectfully requests that this motion is granted and that the Court orders the US Marshalls not to transfer Mr. Santiago Rodríguez to a facility outside the jurisdiction of this court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of May 2022.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/Diego H. Alcalá Laboy
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